



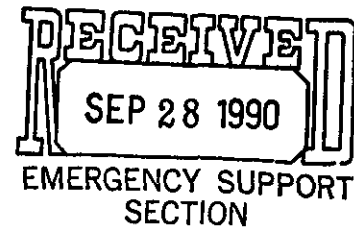
**GOSHEN RUBBER**

55957

GOSHEN RUBBER CO., INC. 1525 SOUTH TENTH STREET P.O. BOX 517 GOSHEN, INDIANA 46526 PHONE 219-533-1111 TWX 810-290-0992

September 26, 1990

Ms. Debbie Fript  
U.S. EPA - Region V  
Emergency Support Section 5HS-12  
230 South Dearborn Street  
Chicago, IL 60604



Dear Ms. Fript:

In December, 1988, we wrote to EPA concerning the "Himco Landfill" in Elkhart, Indiana. This was in response to a letter from Ms. Susan Swales (5HS-11) which we received on November 18, 1988 (copy enclosed).

We are advised by counsel that we have no liability for the cost of site clean-up because:

1. The Himco Landfill was closed in 1976.
2. We acquired the assets of Bower Manufacturing in 1985, and moved its operations into a new facility in 1987.
3. We have never made any arrangements with Himco or any other company to dispose of any material at the site in question.
4. We have contracted with Himco after 1985, to remove material from our premises. All of that material was trash, and all went to a different site.
5. We contracted with other parties to dispose of hazardous materials. All of that material went to the Diaz Refinery in Arkansas, and despite having received certification of disposal from Diaz, we have participated in the costs of cleaning up the Diaz site.

Future contact on this subject, if any, should be made to the undersigned.

Very truly yours,

GOSHEN RUBBER CO., INC.

Dave Bontrager  
Corp. Director, Human Resources

DB/mk  
Enclosure

# BOWER manufacturing corp.

2515 Industrial Park Drive  
P.O. Box 116  
GOSHEN, INDIANA 46526

219/533-0525

industrial marking,  
packaging and assembly

December 13, 1988

Ms. Susan Swales (SHS-11)  
Waste Management Division  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago IL 60604

Ms. Swales:

Please find below our response to your recent request for information regarding the Himco Landfill. We understand through our telephone conversation of 11/22/88 that the time period in question is from 1960-1978 rather than 1960-present as stated in the information request.

1. Bower Manufacturing Corporation (SIC Codes 3499, 2711, 3079) specializes in contract services to industry. Those services include industrial marking, packaging, and assembly. We also warehouse and distribute rubber products manufactured at other plants within our corporation. No hazardous wastes are generated during our processes, however some petroleum based solvents are used to clean up after printing operations and small quantities of used solvents remain. These solvents are collected in an approved container and disposed of at an approved site. Bower is a small quantity generator of hazardous waste and generates less than one 55 gallon drum per year.
2. The only firm that Bower has used to dispose of hazardous waste materials is Chem-Care, Inc.

CHEM-CARE Inc.  
3416 S. Post Road  
PO Box 39085  
Indianapolis IN 46239  
(317) 862-5195

The person responsible for making arrangements for the disposal of waste materials at the Bower facility is the Plant Manager, Doug VanLue.

Ms. Susan Swales (5HS-11)  
Waste Management Division  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago IL 60604

3. The Goshen Rubber Company acquired Bower Manufacturing in July, 1985, and moved the operation to a new facility in 1987.

Since acquiring Bower in 1985, no arrangements have been made with HIMCO, Inc. or HIMCO WASTE-AWAY or any other company to dispose of waste at the site in question as it closed in 1978. HIMCO has been used for removal of trash, but no materials were disposed of in this manner and none of the trash removed ended up at the site in question. All hazardous or toxic materials generated by Bower Manufacturing for disposal since acquisition have been hauled and/or disposed of by parties other than HIMCO, and none of those parties have used the site in question.

The company does not have and is unable to obtain records concerning the disposal of hazardous materials, if any, from Bower Manufacturing Company, Inc. prior to acquisition in 1985. Verbal conversation with officials of the old company indicate that there was no hazardous waste activity prior to the purchase of the company. HIMCO was contracted to remove trash only.

Sincerely,



Douglas W. VanLue

BOWER MANUFACTURING CORPORATION

DWV/ns1

Sworn to and subscribed before me this 13th day of December, 1988.

State of Indiana  
County of Elkhart


My commission expires 10-20-91.

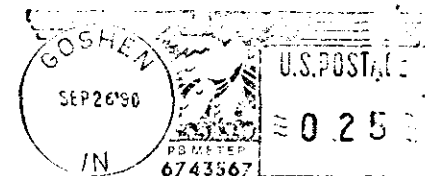
  
Natalie S. Leach

GOSHEN, INDIANA 46526

P.O. BOX 517

GOSHEN RUBBER CO., INC.

  
**GOSHEN RUBBER**  
Dave Bontrager



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